



South Carolina  
Department of Transportation  
Office of Legal Services

190186

Linda C. McDonald  
Chief Counsel

Assistant Chief Counsel  
Natalie J. Moore  
Barbara M. Wessinger  
Deborah Brooks Durden  
and Legislative Liaison  
Beacham O. Brooker, Jr.  
Amanda T. Taylor

January 9, 2008

Hon. Charles L.A. Terreni, Chief Clerk  
Public Service Commission of South Carolina  
PO Drawer 11649  
Columbia, South Carolina 29211

RE: Docket No. 2007-328-C  
Petition of SCDOT for Implementation of 511 Service

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of the Department's (Petitioner's) MOTION FOR EXPEDITED RULING ON PETITION ON THE BASIS OF VERIFIED TESTIMONY. I would appreciate your filing this with the case record and notifying me of any hearings or further proceeding regarding the motion.

I have mailed copies of the foregoing to all counsel for interveners and to counsel for the Office of Regulatory Staff.

Very truly yours,

Beacham O. Brooker, Jr.

Cc: Nanette S. Edwards  
Patrick W. Turner  
Margaret M. Fox  
Steve W. Hamm  
C. Jo Anne Wessinger Hill  
Scott Elliott

bobjr:

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COMMISSION

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

Docket No. 2007-328-C

In re:

Petition of the South Carolina  
Department of Transportation for  
Implementation of 511 Service for  
Travel Information

**MOTION FOR EXPEDITED  
RULING ON PETITION ON THE  
BASIS OF VERIFIED TESTIMONY**

The South Carolina Department of Transportation (SCDOT) respectfully moves the Commission to forego the formal hearing scheduled in this matter and rule on the basis of the Petition and the verified direct testimony of Tony S. Sheppard.

**I. INTRODUCTION**

SCDOT filed with the Commission a Petition by letter dated September 7, 2007, from H. B. Limehouse, Secretary, to the Clerk, seeking an order designating 511 as the abbreviated telephone dialing code for travel information in South Carolina and asking that SCDOT be designated the lead agency in the State to administer that service. After docketing, petitions to intervene were filed on behalf of Verizon South, Inc., United Telephone Company of the Carolinas, the South Carolina Telephone Coalition, and BellSouth Telecommunications Incorporated and those entities are parties of record hereto. The Commission issued its Notice of Hearing on October 22, 2007, setting forth dates for prefiled testimony and rebuttals. A Notice of Rescheduled Hearing was issued

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January 2, 2008, establishing the hearing date hearing as January 30, 2008. SCDOT filed verified testimony of its employee, Tony S. Sheppard in support of its petition on November 19, 2007. Prior to the date directed for filing responses, letters were filed from the Office of Regulatory Staff and United Telephone Company of the Carolinas. Neither interposed any objection to the petition and direct testimony. No other parties filed responses prior to the deadline.

## **II. FACTS SUPPORTING REQUEST FOR EXPEDITED RULING.**

As set forth in the Petition and in Mr. Sheppard's testimony, the Federal Communications Commission (FCC) on July 31, 2000, issued a report and order on a petition by the U.S. Department of Transportation finding the assignment of a nationwide, easy to remember three-digit dialing code for non-emergency transportation information to be in the public interest. The FCC identified 511 for this purpose but concluded that the various state public service commissions should retain jurisdiction to actually implement 511. To date 27 states including North Carolina and Georgia have implemented 511. SCDOT will be prepared to launch its system October 1, 2008. Correspondence has been exchanged with all land-line carriers in South Carolina and a number of wireless carriers. All have indicated that they will be able to program the translation of the 511 number on their systems by that date.

The 511 system will be a state-of-the-art information network that will provide real-time, route-specific information on all types of surface travel through landline and wireless telephones. The system will allow commuters and travelers to make more

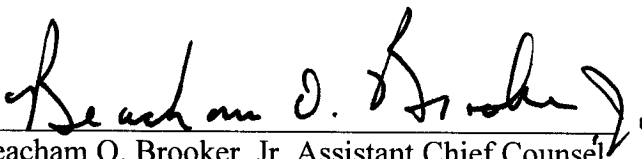
efficient use of the State's transportation infrastructure through better informed choices as to where and when to travel.

SCDOT has statutory authority pursuant to S.C. Code Ann. §57-3-110(3) to regulate traffic and travel on the State Highway System and believes that it is the most appropriate agency to administer a program of this State-wide scope. No other public entity has expressed an interest in implementing or managing 511.

### **III. CONCLUSION**

Upon the understanding (with Petitioner's agreement) that previously filed tariffs for this service not be affected by the Order counsel of all interveners in this proceeding have consented to this motion as evidenced by the signatures that follow. For the foregoing reasons, SCDOT requests that its Petition be granted at the earliest possible Agenda Session on the basis of the record.

Submitted this ninth day of January, 2008.

By:   
Beacham O. Brooker, Jr. Assistant Chief Counsel  
SCDOT  
Post Office Box 191  
Columbia, South Carolina 29202-0191  
(803) 737-2240  
[brookerbo@scdot.org](mailto:brookerbo@scdot.org)

**MOTION FOR EXPEDITED RULING ON PETITION ON THE BASIS OF  
VERIFIED TESTIMONY**

I consent:

Nanette S. Edwards

Nanette S. Edwards  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia SC, 29211

**MOTION FOR EXPEDITED RULING ON PETITION ON THE BASIS OF  
VERIFIED TESTIMONY**

*DOCKET NO. 2007-328-C put*

I consent

*Patrick Turner*

Patrick W. Turner

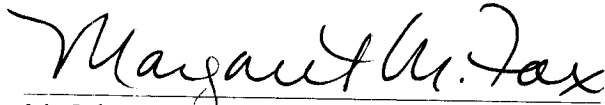
P.O. Box 752

Columbia SC, 29202

Attorney for BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina d/b/a  
AT&T Southeast

**MOTION FOR EXPEDITED RULING ON PETITION ON THE BASIS OF  
VERIFIED TESTIMONY**

I consent

A handwritten signature in black ink, reading "Margaret M. Fox". The signature is written in a cursive style with a large, stylized "M" and "F".

M. John Bowen, Jr.

Margaret M. Fox

McNair Law Firm, P.A.

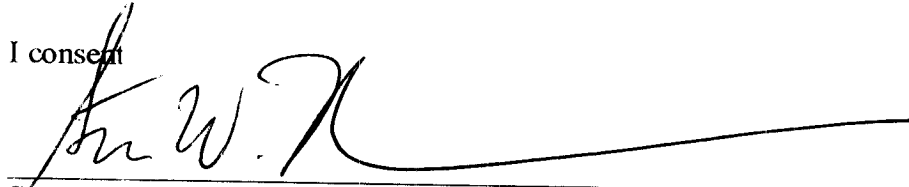
Post Office Box 11390

Columbia SC, 29211

Attorneys for the South Carolina Telephone Coalition

**MOTION FOR EXPEDITED RULING ON PETITION ON THE BASIS OF  
VERIFIED TESTIMONY**

I consent

A handwritten signature in black ink, appearing to read "Steve W. Hamm", is written over a horizontal line.

Steve W. Hamm

C. Jo Anne Wessinger Hill

Richardson Plowden Carpenter & Robinson, P.A.

P.O. Box 7788

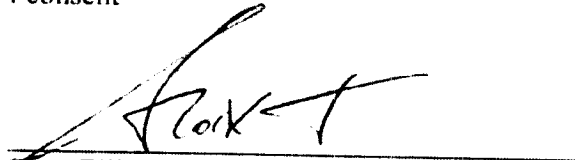
Columbia SC, 29202

Attorney for Verizon South Incorporated



**MOTION FOR EXPEDITED RULING ON PETITION ON THE BASIS OF  
VERIFIED TESTIMONY**

I consent

A handwritten signature in black ink, appearing to read "Scott Elliott", is written over a horizontal line.

Scott Elliott  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia SC, 29205

Attorney for United Telephone Company of the Carolinas d/b/a Embarq

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

Docket No. 2007-328-C

In re:

Petition of the South Carolina Department of  
Transportation for Implementation of 511  
Service for Travel Information

**CERTIFICATE OF SERVICE BY  
MAIL**

I certify that I have caused a copy of the below-mentioned documents to be served upon the following party by depositing same in the United States mail, with postage prepaid and affixed thereto, addressed as follows, this 10<sup>th</sup> day of January, 2008.

**Pleadings Served:**

- (1) Motion for Expedited Ruling of Petition on the Basis of Verified Testimony

**Parties Served:**

Nanette S. Edwards  
Office of Regulatory Staff  
PO Box 11263  
Columbia, SC 29211

Patrick W. Turner  
BellSouth Telecommunications, Inc.  
d/b/a AT&T South Carolina  
d/b/a AT&T Southeast  
PO Box 752  
Columbia, SC 29202

Margaret M. Fox  
McNair Law Firm, PA  
Post Office Box 11390  
Columbia, SC 29211  
SC Telephone Coalition

Steve W. Hamm

C. Jo Anne Wessinger Hill  
Richardson Plowden Carpenter & Robinson,  
PA  
PO Box 7788  
Columbia, SC 29202  
Attorney for Verizon South Incorporated


Scott Elliott  
Elliott & Elliott, PA  
721 Olive Street  
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Attorney for United Telephone Company of  
the Carolinas, d/b/a Embarq

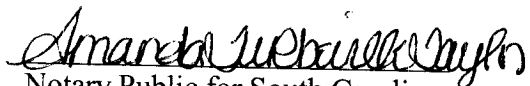
PUBLIC SERVICE  
COMMISSION

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SWORN TO BEFORE ME  
in Columbia, South Carolina, this  
19th day of January, 2008.

  
Dana L. Ammer, Paralegal

  
Notary Public for South Carolina  
My Commission Expires: 8-7-08